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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;
ORACLE AMERICA, INC., A Delaware
corporation; and ORACLE INTERNATIONAL
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;
AND SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-0106-LRH-PAL

**STIPULATION AND [PROPOSED]
ORDER TO (1) EXTEND DEADLINE
TO FILE MOTIONS TO COMPEL
AND CONCERNING OTHER
DISCOVERY DEADLINES AND (2)
TO SCHEDULE THE NEXT CASE
MANAGEMENT CONFERENCE**

Courtroom: 3B

Judge: Magistrate Peggy A. Leen

Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corp.
(collectively, “Oracle” or “Plaintiffs”) and Defendants Rimini Street, Inc. (“Rimini Street”) and
Seth Ravin (“Ravin”) (together, “Rimini” or “Defendants”) stipulate as follows and request that
the Court enter the [Proposed] Order set forth below.

1. On November 4, 2011, Oracle served its Third Set of Requests for Admission on
Rimini. Rimini’s deadline to respond to these RFAs is December 5, 2011. Rimini has requested
a two week extension of time to respond to these RFAs, which would make them due December
19, 2011. Oracle agrees to this extension if the existing December 19 deadline to file motions to
compel is pushed back.

2. The parties anticipate producing additional documents, amending discovery
responses, and receiving additional third party productions after the existing fact discovery cutoff
on December 5, 2011. The parties agree that documents produced or amended discovery
responses served by the parties by December 19 should be considered to have been produced
during the fact discovery period of the case, as should be documents produced by third parties
after the December 5 fact discovery cutoff if the third party was timely subpoenaed before the
December 5 discovery cutoff.

3. In light of the parties’ agreements in paragraphs 1 and 2 above, a number of

1 discovery responses or amended responses may be served on December 19. Accordingly, the
2 parties jointly request that the deadline to file a motion to compel be extended. Because the
3 Court's practice has been to hear motions to compel at Case Management Conferences, the
4 parties request that the Court schedule a further CMC on January 10, 2012, if that date is
5 convenient for the Court, and to extend the deadline to move to compel to the filing of the joint
6 CMC statement.

7 4. In addition, Oracle is still analyzing Rimini's recent productions, including to
8 what extent Rimini has produced Support Service Agreements for customers identified in Exhibit
9 A to Rimini's response to Oracle's Interrogatory No. 27. These Rimini agreements contain
10 product and date information that is necessary for Oracle to confirm it has accurately identified,
11 collected, and produced the corresponding Oracle support contract information for relevant
12 customers. To the extent Rimini produces additional relevant agreements from now until
13 December 19, Oracle may require two weeks after Rimini produces its agreements to produce
14 corresponding Oracle contract information.

15 5. This agreement between the parties is intended only to alter the dates agreed to
16 herein, and the parties will not use this agreement as a basis to seek changes to other case
17 deadlines.

18 Accordingly, the parties request that the Court order as follows:

19 A. Rimini's deadline to respond to Oracle Third Set of Requests for Admission is
20 extended to December 19, 2011.

21 B. Documents produced or amended discovery responses served by the parties by
22 December 19 will be considered to have been produced or served during the fact discovery
23 period of the case, as will be documents produced by third parties after the December 5 fact
24 discovery cutoff if the third party was timely subpoenaed before the December 5 discovery
25 cutoff.

26 C. To the extent Rimini produces additional Support Service Agreements for
27 customers identified in Exhibit A to Rimini's response to Oracle's Interrogatory No. 27 between
28 November 29 and December 19, Oracle has two weeks after Rimini produces such agreements to

1 produce corresponding Oracle contract information.

2 D. The next Case Management Conference is scheduled for January 10, 2012 at ____
3 a.m., or at such time as is convenient for the Court. The deadline to file motions to compel is
4 extended to the date of filing the joint CMC statement for that CMC.

5
6
7
8 DATED: November 30, 2011

9 BINGHAM McCUTCHEN LLP

SHOOK, HARDY & BACON LLP

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18 *Attorneys for Plaintiffs*

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19
20 Pursuant to stipulation, it is SO ORDERED.

21 _____
22 Hon. Peggy A. Leen
23 United States Magistrate Judge
24
25
26
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ATTESTATION OF FILER

The signatories to this document are myself and Robert Reckers and I have obtained Mr. Reckers's concurrence to file this document on his behalf.

DATED: November 30, 2011

BINGHAM McCUTCHEN LLP

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PROOF OF SERVICE

I am over eighteen years of age, not a party in this action, and employed in San Francisco County, California at Three Embarcadero Center, San Francisco, California 94111-4067. I am readily familiar with the practice of this office for collection and processing of correspondence for email delivery.

Today I caused to be served the following document:

STIPULATION AND [PROPOSED] ORDER TO (1) EXTEND DEADLINE TO FILE MOTIONS TO COMPEL AND CONCERNING OTHER DISCOVERY DEADLINES AND (2) TO SCHEDULE THE NEXT CASE MANAGEMENT CONFERENCE



(BY ELECTRONIC MAIL) by transmitting via electronic mail document(s) in portable document format (PDF) listed below to the email address set forth below on this date.

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I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made and that this declaration was executed on November 30, 2011 at San Francisco, California.

/S/Kelley A. Garcia

Kelley A. Garcia